

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

DEBTOR(S): MCCLAIN FEED YARD, INC., et al.,¹	BANKRUPTCY CASE NO.: 23-20084-RLJ-7 (Jointly Administered)
CAPTION & CASE NO. OF ADVERSARY:	DATE OF TRIAL/HEARING AND NATURE OF PROCEEDING: <u>Hearing: September 11, 2024 at 1:30 p.m.</u> Trustee's Motion to Compel Production of Documents from Rabo AgriFinance, LLC and Focus Management (<i>Docket #268</i>)

TRUSTEE'S WITNESS AND EXHIBIT LIST

Now comes, Kent Ries, Trustee of the referenced Chapter 7 bankruptcy estates, and files this Witness and Exhibit List in connection with the Trustee's Motion to Compel Production of Documents from Rabo AgriFinance, LLC and Focus Management [*Docket #268*], set for hearing on September 11, 2024, at 1:30 p.m:

1. Hudson Jobe
2. Any witness designated by any other party.
3. Any impeachment or rebuttal witness.
4. Trustee reserves the right to amend this designation as appropriate.

EXHIBITS

<u>EXHIBIT</u>	<u>DESCRIPTION OF EXHIBIT</u>
A	Rabo Proof of Claim
B	Rabo Loan Information Statement regarding McClain Farms, Inc.
C	Debtors' Mechanics Bank Statements from December 2022
D	August 1, 2023, email correspondence from Rabo counsel regarding discovery
E	May 7, 2024, Order Authorizing Rule 2004 Subpoenas to Rabo and Focus
F	Trustee's Rule 2004 Subpoena to Rabo
G	Trustee's Rule 2004 Subpoena to Focus
H	May 8, 2024, Acceptance of Service by Focus
I	May 10, 2024, Acceptance of Service by Rabo
J	June 5, 2024 letter from Michael Johnson

¹ The Debtors in these chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ).

K	August 21, 2024, Opposition to Motion for Instructions, filed in Case No. ECU003066, Superior Court of the State of California, County of Imperial
L	September 6, 2024 Screenshot of Rabo Production
M	September 6, 2024, email correspondence with Rabo counsel regarding discovery
	The Trustee reserves the right to limit any document to redacted form.
	Any exhibit designated by any other party.
	Any pleadings, reports, or other documents filed in the Debtors' bankruptcy cases.
	Any impeachment or rebuttal exhibits.
	All attachments or exhibits to any of the foregoing documents.

Trustee reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the hearing.

Respectfully submitted,

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By: /s/ Alan Dabdoub

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SPECIAL COUNSEL FOR KENT RIES, TRUSTEE

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing witness and exhibit list was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service on September 8, 2024.

/s/ Alan Dabdoub